

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

PROGRESSIVE AMERICAN )  
INSURANCE COMPANY, )

PLAINTIFFS-STAKEHOLDERS, )

V. )

Civil Action No.: CV-06-717.ID

CAROL THORN, et al., )

DEFENDANTS-CLAIMANTS. )

ANSWER OF DEFENDANT SOUTH BALDWIN REGIONAL MEDICAL CENTER  
TO COMPLAINT

Comes now the Defendant sued as LV Stabler Memorial Hospital (correctly identified as Greenville Hospital Corporation d/b/a LV Stabler Memorial Hospital , and for Answer to Plaintiff's Complaint says as follows:

1. Without sufficient information to admit or deny, therefore denied.
2. Without sufficient information to admit or deny, therefore denied.
3. Without sufficient information to admit or deny, therefore denied.
4. Without sufficient information to admit or deny, therefore denied.
5. Without sufficient information to admit or deny, therefore denied.
6. Without sufficient information to admit or deny, therefore denied.
7. Without sufficient information to admit or deny, therefore denied.
8. Without sufficient information to admit or deny, therefore denied.
9. Without sufficient information to admit or deny, therefore denied.

10. Admitted.

In addition , Defendant Hospital claims that it is entitled to an amount of the insurance proceeds equal to the amount of benefits and services provided by it to the patients treated at its facility.

/s/ Greer B. Mallette  
Richard E. Smith  
Greer B. Mallette  
Attorneys for defendant Greenville Hospital  
Corporation d/b/a L.V. Stabler Memorial Hospital

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served a copy of the foregoing pleading upon all counsel of record in this cause by placing a copy of same in the United States mail, postage prepaid, addressed as follows on this the 18th day of June, 2007:

Sidney W. Jackson, III  
Jackson, Foster & Graham  
P.O. Box 2225

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/s/ Greer B. Mallette  
OF COUNSEL